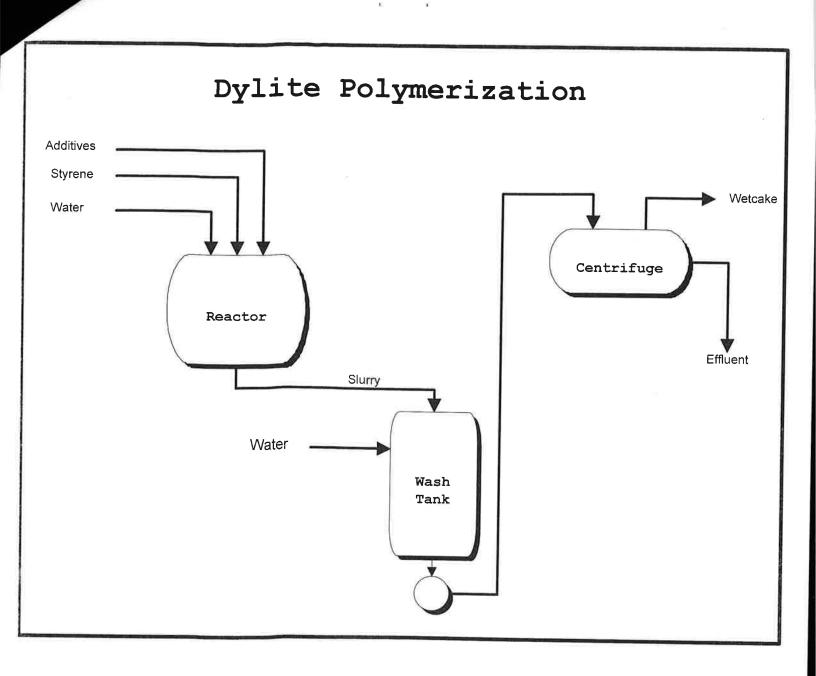
Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment # 1 of 13

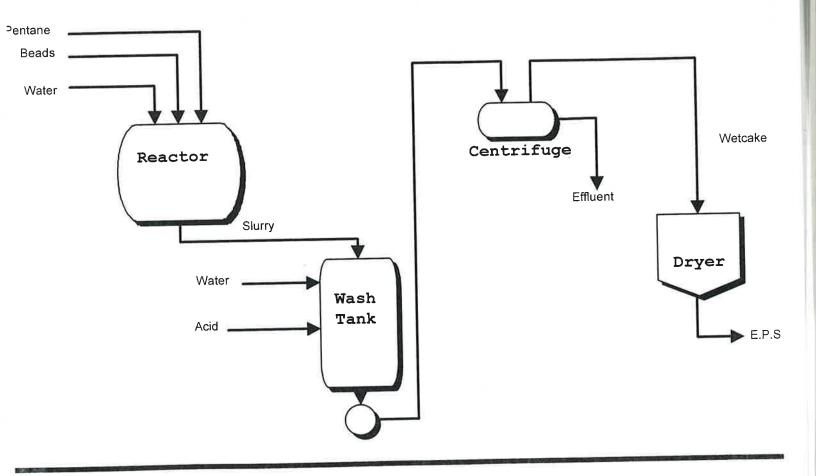


Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment $\#\underline{\mathcal{Q}}$ of 13

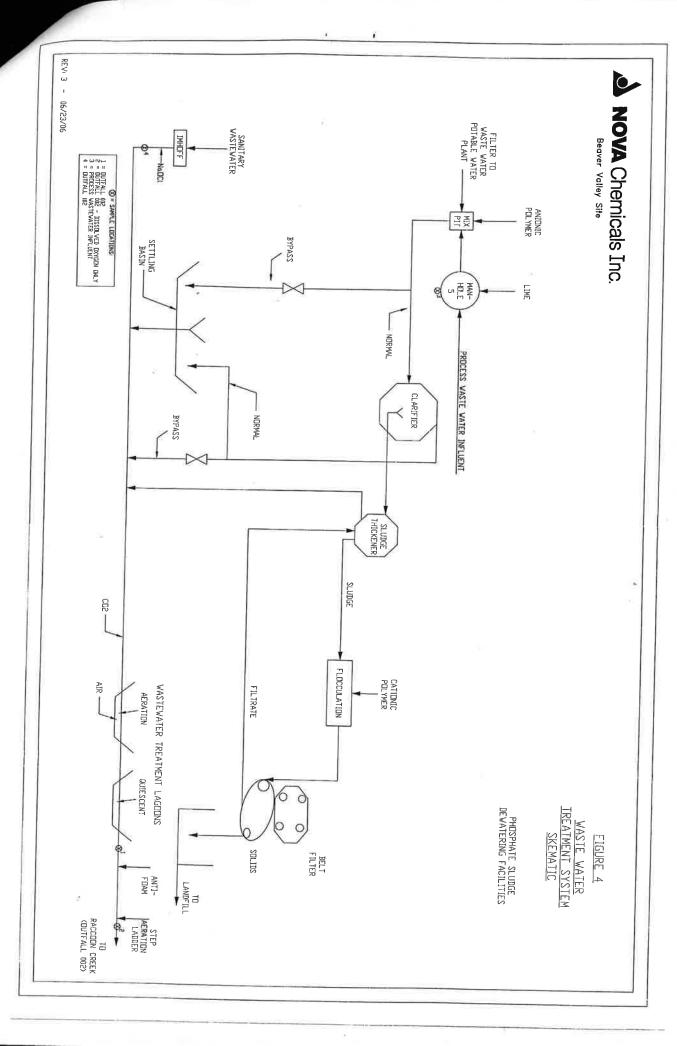
Dylite Impregnation



Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment #3 of 13



Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment # 4 of 13

Transporter 2 Company Name 8. Designated Facility Name, and Site Address 1. Transporter 2 Company Name 8. Designated Facility Name, and Site Address 1. Transporter 2 Company Name 9. Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 1. Transporter Site of the State of Company Name Remarks (Dout, Data) 2. 2. 3. 3. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4.	gnment are fully to applicable in Acknowledgme	nternational and nati ent of Consent.	OCS 2 (if different th	U.S. EPAID II U.S. EPAID II U.S. EPAID II U.S. EPAID II	Number Number Number	050826 4 8 4 1	LWAS	
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US EPA ID No. PAR 0000 7398L

Yes No

Yes No

Yes No

Yes No NA

Yes No

NA NA

NA

NA

Doc. No.: 000	2087FIM		And No.		31110	
(1) Manifest Page/Line Item	(2) Hazardous Waste Code (One line)A	(3) Waste Water'	Non-Waste WaterB	(5) Subcategory (if applicable)	(6) Underlying Constituents?' (Circle one)	(7) Applicable Certification E (One per line)
1/1	1000		X	Ian table In new	Yes (No) NA	
1//	Ston		X	Benzac	Yes(No)NA	and the second

To list additional waste codes complete a WTI LDR Continuation Form (WTILDR2). Complete a WTI Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3) if one or more applicable waste codes are F001, F002, F003, F004, F005, or F039.

- Must check one, either wastewater or non-wastewater.
- Enter "NA" if no subcategory is applicable to the waste code (see 40 CFR 268.40).

Chemicale Tax

- If "Yes" is circled, complete WTI Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3). For F001-F005 or F039 wastes, circle "NA" and identify F001 F005 or F039 constituents on WTILDR3.
- Choose from list of certifications below and enter number. Enter only one number per line, Enter date is subject to prohibition if Certification #3 applies.
- (1) <u>Waste Does Not Meet Applicable Treatment Standards</u> This is a restricted waste that does not meet the applicable treatment standards set forth in Subpart D of 40 CFR Part 268.
- (2) Waste Meets Applicable Treatment Standards I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment.
- (3) <u>Waste Subject to Exemption</u> This waste is subject to an exemption from a prohibition, such as a case-by-case extension, an exemption, or a nationwide capacity variance (include date subject to LDR in Column 7)
- (4) Waste Treated to Applicable Treatment Standards (choose one):
 - (4a) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - (4b) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- (5) <u>Characteristic Waste Treated to Remove Characteristic (choose one):</u>
 - (5a) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. The decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - (5b) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying hazardous constituents, as defined in 268(i), have been treated on-site to the 268.40 Universal Treatment Standards. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Printed/Typed Name Authorized Signature Date

Heritage-WTI, Inc. does not warrant the acceptability of this form for any specific purpose, waste or treatment method and does not warrant that its use will constitute compliance with applicable law and expressly disclaims responsibility or liability, for any penalties, damages or other costs which may arise out of or be related to use of this document.

Page I of

Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment #_5 of 13

		designed for use on elite (12-pitch) typewriter.)	2, Page 1 of 3. Eme	rgency Response	Phone	4. Manifest 1			I. OMB No. 2	2050-003
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	Gene 6. Tra	rator's Phone: rsporter 1 Company Name HERET AGE TRANSPORT, UNC.	1			U.S. EPA ID N TEXT 05848				
	7. Tra	nsporter 2 Company Name				U.S. EPA ID N		-		
	8. De:	signated Facility Name and Site Address)107	U.S. EPA ID N	lumber			
		120 St. CEORGE STREET	j.							
	Facilit	EAST LIVERFOOL, OH #3930 ys Phone: (330)363-7337	gf)			DHID9806	513541			
	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))	ег,	10. Contair No.	ners Type	11. Total Quantily	12. Unit Wt./Vol.	13.	. Wasle Codes	ŝ
K I		AQ, UN1993, Waste Flammable Liquids, N.O.S.	4. 1					10001	D018	
GENERATOR	X	(Styrens) (D001,D018) 3. P.G. II - EEG# 138		220	MC	400	32			
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	15.	SENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of t	his consignment are fully a	and accurately des	scribed abov	e by the proper shi	pping nam	e, and are cla	assified, packa	aged,
	1	marked and labeled/placarded, and are in all respects in proper condition for transport a Exporter, I certify that the contents of this consignment conform to the terms of the attack	hed EPA Acknowledgmen	t of Consent.		and the same	If export sl	hipment and	I am the Prima	агу
	Gener	certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a later's/Offeror's Printed/Typed Name	Signature	(b) (irji am a sma	iii quantity ge	enjerator) is true.		Mo	onth Day	Year
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Î	_	screpancy Indication Space Quantity Type	, ,	Residue		Partial Reje	ection		Full Reje	ection
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٦	18b. A	Alternate Facility (or Generator)				U.S. EPA ID N	umber	η,		
PACI	Facilit	y's Phone:								W-
MAIEL	18c. S	ignature of Alternate Facility (or Generator)	N.						lonth Day	Year
SIGNALED FACILITY	19. Ha	azardous Waste Report Management Method Codes (i.e., codes for hazardous waste tr	eatment, disposal, and rec	cycling systems)		4.				
۵		1-to40 Ho40	1 1	040		, , , , , , , , , , , , , , , , , , ,				
		esignated Facility Owner or Operator: Certification of receipt of hazardous materials cov d/Typed Name	ered by the manifest exce Signature	pt as noted in Item	18a			М	onth Day	Year
1		KOUIN WARE	1. 1	LL	. 0				81/3	12.



(Form designed for use on elite (12-pitch) typewriter.) M HAZARDOUS 1. Generator ID Number 4. Manifest Tracking Number 2. Page 1 of 3. Emergency Response Phone STE MANIFEST 000447546WAS (300) 351-1115 0000053136 Generator's Name and Mailing Address Generator's Site Address (if different than mailing address) SHILL Generator's Phone: 334 2770 - 350 \$ manusc # \$5741 Transporter 1 Company Name U.S. EPA ID Number 7. Transporter 2 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address U.S. EPA ID Number Facility's Phone: DHD 920 (139 4 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 9a. 10. Containers 11. Total 12. Unit 13. Wasle Codes and Packing Group (if any)) НМ 120, Ul 1992, Tieze Prannede Liquida 11.0.5. Osprenel (DDIII CEIS) 2. Roje ti No. Туре Quantily Wt./Vol. GENERATOR 140 3 300 Til. 🐧 III 180 M. Wite Stjoens Mesomer, Steblised Dola. (0018, 0001) FALE # 1380 22/12 3001 Fine RQ, Utill Mo. Waste Ethylbenzene ERG# 130 14. Special Handling Instructions and Additional Information 1927 MEMPLO 201117 VESS 0177116 201117 WF77 0754681 201117 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is tyric Generator's/Offeror's Printed/Typed Name TH. HAMLESSIS 16. International Shipments Import to U.S. Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.: TR ANSPORTER 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Signature Month Day Transporter 2 Printed/Typed Name Month Day Year 18, Discrepancy 18a. Discrepancy Indication Space Туре Quantity __ Residue Full Rejection Partial Rejection Manifest Reference Number: FACILITY 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: GNATED 18c. Signature of Alternate Facility (or Generator) Month Day Year 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 4. 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month Day Year

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		POUL	1. Generator ID No	ımber		2. Page 1 of	3. Eme	ergency Response	Phone	4. Manifest	Tracking N	umber	or Little	et.
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	20. De	esignated Facility Owner or	Operator: Certifica	lion of receipt of hazard	lous materials covere	ed by the manif	est exce	pt as noted in Item	18a					
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Mova Chemicals, Inc. US EPA ID No.: PAR 000 023 986

anifest Doc. No.: 000467566WAS

(1) Manifest Page/Line Item	(2) Hazardous Waste Code (One line)A	(3) Waste Water'	(4) Non-Waste WaterB	(5) Subcategory (if applicable)	(6) Underlying Constituents?' (Circle one)	(7) Applicable Certification E (One per line)
1/1	D001		X	Ignitable Liquid, Incineration	Yes No NA	1
1/1	D018		X	N/A	Yes No NA	1
1/2	D001		X	Ignitable Liquid, Incineration	Yes No NA	1
1/2	D018		X	N/A	Yes No (NA)	1
1/3	D001		X	Ignitable Liquid, Incineration	Yes No NA	1
1/3	F003		X	Ethyl Benzene	Yes No (NA)	1
					Yes No NA	

- To list additional waste codes complete a WTI LDR Continuation Form (WTILDR2). Complete a WTI Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3) if one or more applicable waste codes are F001, F002, F003, F004, F005, or F039.
- B Must check one, either wastewater or non-wastewater.
- Enter "NA" if no subcategory is applicable to the waste code (see 40 CFR 268.40).
- If "Yes" is circled, complete WTI Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3). For F001-F005 or F039 wastes, circle "NA" and identify F001 F005 or F039 constituents on WTILDR3.
- Choose from list of certifications below and enter number. Enter only one number per line. Enter date is subject to prohibition if Certification #3 applies.
- (1) Waste Does Not Meet Applicable Treatment Standards This is a restricted waste that does not meet the applicable treatment standards set forth in Subpart D of 40 CFR Part 268.
- (2) Waste Meets Applicable Treatment Standards I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment.
- (3) <u>Waste Subject to Exemption</u> This waste is subject to an exemption from a prohibition, such as a case-by-case extension, an exemption, or a nationwide capacity variance (include date subject to LDR in Column 7)
- (4) Waste Treated to Applicable Treatment Standards (choose one):
 - (4a) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - (4b) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- (5) <u>Characteristic Waste Treated to Remove Characteristic (choose one):</u>
 - (5a) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. The decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - (5b) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying hazardous constituents, as defined in 268(i), have been treated on-site to the 268.40 Universal Treatment Standards. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Printed Typed Name Authorized Signature

8/13/12 Date

Heritage-WTI, Inc. does not warrant the acceptability of this form for any specific purpose, waste or treatment method and does not warrant that its use will constitute compliance with applicable law and expressly disclaims responsibility or liability, for any penalties, damages or other costs which may arise out of or be related to use of this document.

Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment #_6 of 13

	was stable transmitter.)		Annual man		Parameter of the control of the cont			A CONTRACTOR OF THE PROPERTY O	
	on elite (12-pitch) typewriter.) J. Generator ID Number J. Generator ID Number	14	Emergency Respons	£3%	4. Manifes	t Tracking I	m Approved Number	- 1/	
	Mailing Address ALS THE	Ge	enerator's Site Addres	s (if different I	than mailing addre	988)	œ II		
4	or's Phone: 724) 770-7359 insporter 1 Company Name	1	Generator #: 9	3741	U.S. EPAID		841	1 4	
7. Tra	insporter 2 Company Name signated Facility Name and Site Address				U.S. EPA ID	Number		F 31.	
.*	1230 ST. GRONGE STREET EAST I.VERFOCE, OH 43930 by's Phone: \$3.0,285-7337				U.S. EPA ID		8131 BY B	WIL N	
9a. HM	ys Phone: 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Conta	iners Type	11. Total Quantity	12. Unit Wt./Vol.	6 1 3 5	Waste Codes	ì
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Χ	UN 3345 WASTE ORGANOMETALL SUBSTANCE, SOLID, WATER BEAD	TEVE	XX I	OF	100	P	9001	0003	
15. (BENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this narked and labeled/placarded, and are in all respects in proper condition for transport acceptorer, I certify that the contents of this consignment conform to the terms of the attached certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large	cording to applicable ed EPA Acknowledg ge quantity generate	e international and nat ment of Consent. or) of (b) (if I am a sm	escribed above	e by the proper sh nental regulations	. If export sh	e, and are clas	am the Prima	ry
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	signated Facility Owner or Operator: Certification of receipt of hazardous materials covered Name 3700-22 (Rev. 3-05) Previous editions are obsolete.	ed by the manifest of Signatur	10-77 7	n 18a	9		Mon FACILITY	3/13	Year

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H	8. Designated Facility Name and Site Address	8			U.S. EPAID N	umber	
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П	RAST LIVERPOOL OH 43970	(8)					5 606 5 6 5
П	Facility's Phone: (33.0)385-7337				BHDA	800	1 3 5 4 1
н	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number	r, ș	10.	Containers	11. Total	12. Unit	13. Waste Codes
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SIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator)						Month Day Yea
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î	1. HOYO 2.	3			4.		
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	Printed/Typed Name		Signature	7/			1 9 113 11"
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	and N	tailing Address ALS, TNC.	- 28		erator's Site Addre		an mailing addres	(J/J/ 38)	J1671	DOWA	3
	cator's Phone: 124	SDAT	-		Generator #:	98741	U.S. EPA ID N	Vumber			
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I	8. Designated Facility Name	711	-				U.S. EPA ID N	Number			9
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1	18a. Discrepancy Indication	Space Quantity	Туре	49.	Residue		Partial Re	jection		Full Re	jection
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	gned for use on elite (12-pitch) typewriter.) 1. Generator ID Number	2. Page 1 of 3. Eme	rgency Response	Phone	4. Manifest	Forr Tracking N	n Approved	d. OMB No	. 2050-00
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	and Mailing Address HELGIC ALS, TMC. ANKFORT ROAD ACA, PA 15061	General S	or's Site Address	(if different th	an mailing addre	ss)		*1	
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95	b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, nd Packing Group (if any))		10. Contai	ners Type	11. Total Quantity	12. Unit Wt/Vol.	13	Waste Coo	es
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Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment #_7 of 13

		25.7	A comment of the comm						
	gned for use on elite (12-pitch) typewriter.) Ganerator ID Number	. 1 1	3. Emergency Respons	,	4. Manifest T	racking N	Approved. umber		2050-0039
	Mailing Address		Generator's Site Address	(if different tha	an mailing address	5)		RE018	10/11
	Company Name		19		U.S. EPA ID N LINID 0584	84114	30		- W
	Company Name		F.		U.S. EPA ID N				
	Pacility's Phone:		î e		U.S. EPAID N				E
1	ga. U.S. DOT Description (including Proper Shipping Name, Hazard Class and Packing Group (if any))	ss, ID Number,	10. Conta	iners Type	11. Total Quantily	12. Unit Wt./Vol.	13.	Waste Code	es
GENERATOR —	TO GRADUEL PRAZERD WASTE, LIOUND NOS	ASSESSED TO THE PROPERTY OF THE PARTY OF THE	1	M	400	P	1039	D040	D013
- GENE	20, UN1993, WASTE FLAMMAGLE LIQUIDS, I STYRENE, RTHYL BENEZENE) (ERIB, DOB) DC I, FO III ERO # 138	1.0.5	3	DM	1200	P	10001	21001	
	3.Q UNITES, WASTE FLAMMABLE LIQUIDS, 1 STYRENE) (ODIE DON) X 2 PO II END #138	205	3	OM	100	P	D018	10001 -	DW3
	AA 7081, HAZARDOUS WASTE LIQUID, N.O.S. TETRACHLOROETHYLENGY S. J. PG III BRO#171		7	DM	400	P	D039	D040	D043.
*	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the marked and labeled/placarded, and are in all respects in proper condition for Exporter, I certify that the contents of this consignment conform to the term I certify that the waste minimization statement identified in 40 CFR 262.27(Generator's/Offeror's Printed/Typed Name	contents of this consignment a or transport according to applic s of the attached EPA Acknowle a) (if I am a large quantity gene	able international and na edament of Consent.	itional governm	ental regulations.	ipping nam If export si	e, and are cla nipment and I Mo	am the Prim	nary
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1	18a. Discrepancy Indication Space Quantily	Туре	Residue	oo Mumbar	Partial Rej	eclion	10	Full Re	jection
SNATED FACILITY	18b. Alternate Facility (or Generator) Facility's Phone: 18c. Signature of Alternate Facility (or Generator)		Manifest Reference	A Notifice 1	U.S. EPA ID N	lumber	M	onth Da	y Year
(3	Hazardous Waste Report Management Method Codes (i.e., codes for hazard 2. Designated Facility Owner or Operator: Certification of receipt of hazardous	3. Materials covered by the manife	est except as noted in Ite	toy a	4.		10%	<u>a</u>	
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		ror use on elite (12-p	itch) typewriter.)	2 Page 1 of		gency Respons	e Phone	4. Manifest T			OMB No. 20	050-0039
		18 Tigen Address	% S2		Generato		s (if different tha	an mailing address	5)	1	The Vall	9/11/2/
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		phone: corter 1 Company Name						U.S. EPA ID N	84111			
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li	Facility 9a. HM	y's Phone: 9b. U.S. DOT Description (including Proper Shipping and Packing Group (if any))	Name, Hazard Class, ID Number	1.		10. Conta	iners Type	11. Total Quantity	12. Unit Wt/Vol.	13.	Waste Codes	
GENERATOR —		1144 1962 HAZAKO WASTE, LIGO TOTK & CHLOROETH FLEIK) 2, 9G ET BRG \$171	D.HOS			1	M	400	P	D039	15:45.5	731842 ************************************
- GENE	20	20, UN1991, WASTI PLAMMABL I TYREME ETHAL BENEZERB) (C). PO IN BROWLE	018, DV01)			3	DM	1200	P	10071	12018	9511 (+2.6314);
	30	SK, PRIDDE WASTE FLAMMAGE SYVREME: DOIR DOIT E. DO IT REGISTS				3	OM	100	P	Divig		DODE
	×	478, NOTE, TOREXPORTED IN (MAZZER LE (TRITTER CHILOPY OF THE VERSEE) 0. FOR RESERVED.				1	ЭM	100	P	D039	pol0.	0643
	わりがある。	452 201117 0117110 3716 201787 0724204	59 20109& 9999128								1	
	Gener	GENERATOR'S/OFFEROR'S CERTIFICATION: I her marked and labeled/placarded, and are in all respects exporter, I certify that the contents of this consignment certify that the waste minimization statement identified rator's/Offeror's Printed/Typed Name	in proper condition for transport ac conform to the terms of the attach	ccording to appl led EPA Acknov rge quantity ge	licable inte wledamenl	rnational and na of Consent.	ational governir	ientai regulations.	ipping nam If export sh	e, and are cla nipment and I	all the Fillia	aged, ary Year
\ \ -	16. Int	ternational Shipments Import to U.S.		Export from	ı U.S.	Port of e	entry/exit:	The state of the s	DJA.	1 6	161/0	1//
R INT'L		eporter signature (for exports only): ansporter Acknowledgment of Receipt of Materials				Date lea	iving U.S.:					
TR ANSPORTER	Transp	porter 1 Printed/Typed Name			gnature		Servery.	1.7		Mo 	1. 11	Year / \
TR AN	Trans	porter 2 Printed/Typed Name		Si	gnature					11 MO	nth Day	,)/Year /
1		screpancy				7				1		
	18a.L	Discrepancy Indication Space Quantity	Туре		L	Residue anifest Referen	re Number	Partial Rej	ection		L Full Reje	ection
SILITY	18b. A	Alternate Facility (or Generator)				dilitar is stated		U.S. EPA ID N	Number			
SNATED FACILITY		ty's Phone: Bignature of Alternate Facility (or Generator)								M	onth Day	/ Year
SNAT	19. Hz	azardous Waste Report Management Method Codes (i.e. codes for hazardous wasto tr	ealment dienos	sal and re-	cyclina systems)					
i	1.	2,	non cours for Hazardous waste the	3.		Junia ayatana		4.				
	20. De	esignated Facility Owner or Operator: Certification of red/Typed Name	eceipt of hazardous materials cove			pt as noted in It	tem 18a			м	onth Day	Year
				s	ignature					1 "	1	1

US EPA ID No.: N

(6)(2) (3) (4)Subcategory (if applicable) Underlying Applicable Non-Waste age/Line Item Hazardous Waste Certification E Water WaterB Constituents?' Waste Code (Circle one) (One per line) (One line)A Yes (No) (No) Yes Yes (No) Yes (No) NA (No) NA Yes Yes (No) NA (No) NA Yes

- To list additional waste codes complete a WTI LDR Continuation Form (WTILDR2). Complete a WTI Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3) if one or more applicable waste codes are F001, F002, F003, F004, F005, or F039.
- Must check one, either wastewater or non-wastewater.
- Enter "NA" if no subcategory is applicable to the waste code (see 40 CFR 268.40).
- If "Yes" is circled, complete WTI Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3). For F001-F005 or F039 wastes, circle "NA" and identify F001 F005 or F039 constituents on WTILDR3.
- ^E Choose from list of certifications below and enter number. Enter only one number per line. Enter date is subject to prohibition if Certification #3 applies.
- (1) <u>Waste Does Not Meet Applicable Treatment Standards</u> This is a restricted waste that does not meet the applicable treatment standards set forth in Subpart D of 40 CFR Part 268.
- Waste Meets Applicable Treatment Standards I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment.
- (3) Waste Subject to Exemption This waste is subject to an exemption from a prohibition, such as a case-by-case extension, an exemption, or a nationwide capacity variance (include date subject to LDR in Column 7)
- (4) Waste Treated to Applicable Treatment Standards (choose one):
 - (4a) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - (4b) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- (5) <u>Characteristic Waste Treated to Remove Characteristic (choose one):</u>
 - (5a) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. The decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - (5b) 1 certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying hazardous constituents, as defined in 268(i), have been treated on-site to the 268.40 Universal Treatment Standards. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Printed/Typed Name

Authorized Signature

Date /

Heritage-WTI, Inc. does not warrant the acceptability of this form for any specific purpose, waste or treatment method and does not warrant that its use will constitute compliance with applicable law and expressly disclaims responsibility or liability, for any penalties, damages or other costs which may arise out of or be related to use of this document.

Page I of 2

NOTICE AND	N N 13
Nova Chemicals	US EPA ID No.: <u>PAR 0000 2386</u>
00029059WAS	

to be used only as a continuation to the WTI LDR Notification and Certification (WTILDR1).

(1) rest Page/Line Item	(2) Hazardous Waste Code (One per line)A	(3) Waste WaterB	(4) Non-Waste Water"	(5) Subcategory (if applicable)	(6) Underlying Constituents?' (Circle one) Yes No NA	Applicable Certification' (One per line)
1 /4 -	:PE00		X	Tetrachlowethlec		
1/4	DOYO.). (*)	X	Trichloweth 100	Yes No NA	
1 //	LOVA!	8 .	X	Unal Chloride		
- 1/3	1003		X	Resetuit	Yes (No) NA	
31, 1 3	3003	5		1	Yes No NA	
					Yes No NA	
	6,	-			Yes No NA	
				7	Yes No NA	
<u> </u>					Yes No NA	
					Yes No NA	
					Yes No NA	
					Yes No NA	
					Yes No NA	
					Yes No NA	-
				1_	Yes No NA	-
					Yes No NA	
					Yes No NA	
	-		*1		Yes No NA	
					Yes No NA	_
					Yes No NA	_
					Yes No NA	
					Yes No NA	
	_	_			Yes No NA	_
					Yes No NA	
			-		Yes'No N	
	_	-			Yes No N.	
					Yes No N	
		-			Yes No N	
	-				Yes No N	A

To list additional waste codes complete a WTI LDR Continuation Form (WTILDR2). Complete a WTI Supplemental F001 -F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3) if one or more applicable waste codes are F001, F002, F003, F004, F005, or F039.

Choose from list of certifications below and enter number, Enter only one number per line, Enter date is subject to prohibition if Certification #3 applies,

Must check one, either wastewater or non-wastewater.

Enter "NA" if no subcategory is applicable to the waste code (see 40 CFR 268.40).

If "Yes" is circled, complete WTI Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (WTILDR3). For F001-F005 or F039 wastes, circle "NA" and identify F001 -F005 or F039 constituents on WTILDR3.

Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment # g of 13

File: E - 314.3



Hazardous Waste Storage Pad Weekly Inspection Log

		Date:	9-18-13	<u> </u>
General:	Haz Pad Satisfactory Yes No	Haz Pad (QA) Satisfactory Yes No	Haz Pad <u>Satisfa</u> Yes	
Properly Segregated	V	V	i/	
Adequete Aisle Space	V	/		
Condition of Containment Sump		/	1/	
No Oil Slick on Containment Sump				
Condition of Dike		V	/	
Drums:				
Labels in Place/Complete	✓	V		
No Leaks	V			
Condition				
Lids/Bungs Tightly Closed				
Co	omments		Date Resolved	Initials
Co	omments	7	INCOMPRISED TO THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER	Initials
Inspected By:	Audited By	A C	INCOMPRISED TO THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER	Initials

Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment # 9 of 13

Run Date: Run Time: Program: Confidential as per information protection policy 10:58:46 2013.09.26 ZHRR0034 Report to list education and courses taken by employees NOVA Chemicals

> Epv. User E LEHENYM . C34 100

Name:

First: Racquel Cook

Education:

Areas of Studies: Certification: School: DEFAULT NO FINAL CERTIF

Courses Attended:

Course (BET #) Long Title

50150352 50150363 50150367 5015034450150346 50150396 50150350 50150318 50150308 50150307 50150306 50005793 50150400 50150401 50150403 50150412 50150407 50150405 50150420 Portable
Dust Hazards US_BV
Electrical Safety 1 US_BV
Electrical Safety 1 US_BV Lockout/Tagout US_BV Hearing Protection BV Incident Learning Overview NOVA_BV Portable Air Sampling _ BV Drug & Alcohol for Emps Respiratory Protection US_BV Nitrogen Safety US_BV Process Safety Mgt Overview US_BV Hazard Communication Emergency Action Plans US_I Portable Fire Extinguishers Accident Prevention Signs & Tags Access To Exposure/Medical Records ISO 9000 Quality Awareness Resource Conservation & Recovery Act Work Permits US_BV Fire Watch US_BV OS_BV ss NO (initial) NOV ı В۷ TSCA SPCC RCRA Work Nitro. Safe HearProtect Hazard Com. PFExt Emer. Action Elec. Dust Haz. PortAirSamp Alcohol & Dr Respiratory Process Mgt Lock/Tagout Line Break Ind. Fire Watch

Spill Prevention Control & Countermea_
Toxic Substance & Control Act US_BV
General Safety Orientation_BV
Incident Learning Process Overview_NOV
Responsible Care Overview (RC STDS)_US Portable Fire Extinguishers Fall Protection Portable Air Sampling BV Emergency Action Plans US_BV Forklift Operation Training US_BV _BV В∀

Emer.

Action

Fall Protect PortAirSamp ForkOpTrng

PFExt

Watch

199 1999 1999

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RC_Over IncLrngOver GenSftyOrien

Permit

1998.12.3

1998.12.31

50162553

50150308

50150367 50150350 50150348

1150403

50150352

50183447 50150346

50150881

Lockout/Tagout US_BV
Nitrogen Safety US_BV
Process Safety Mgt Overview
Respiratory Protection US_B Hearing Protection Fire Watch Work Permits US_BV
Responsible Care Overview NOVA_BV Forklift Proficiency Check/Toyota SDR Spill Prevention Control & Countermea Resource Conservation & Recovery Act DS_BV BV VΒV US_BV

Process Mgt

Nitro. Lock/Tagout HearProtect

Safe

Work Permit Respiratory

RCRA RC Over

FORKPROFSDR

Short Title ISO 9000 Qua Start Date

End Date

Safe 1 1998.12.31 1998.12.31 1998.12.31 1998.12.31 1998.12.31 1998.12.31 1998.12.31 1998.12.3 1998.12.31 1998.12.31 1998.12.31 1998.12.31

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003.02.	003.02.	RBS	CM Alertness Recovery/Bike	127
003.02.	003.02.	atig	atigue Countermeasure Initial	2453
003.02.	003.02.	ORKPROFMPJ	orklift Proficiency Check/MP	27233
00 U . O F .	003.01.	ork Perm	ork Permits US_BV	150412
002.11.	002.11.	DOG	pill Prevention Control	0150
002.10.	002.10.	/D4MTRLP	3/D4 Material Packager_B	017719
2002.09.25	2002.09.25	LUEFLAGPRO	ue Flag Procedure BV	50177140
002.09.	002.09.		OXIC STUBSCATION ROLLING ACC SULL	7 4 0 0 1 0
002.08.	002.08.		esource conservation a secovery	015041
002.08.	002.08	D €	rocess Safety Mgt Overview OS_8v	15040
002.04.			eliness Checkpoint_BV	16244
002.04.	002.04.	eproduce H	eproductive Health Hazard	15040
002.04.	002.04.	azard Com	azard Communication US_BV	15036
002.04.	002.04.0	EMR	ccess To Exposure/Medic	15030
002.02.	002.02.	μ.	ire Watch US_BV	15035
002.02.	002.02.	X	ortable Fire Extinguishers BV	15035
002.01.	002.01.3	ORKSITDOW	ork Lift Prof. Ck Trag/Sitdown	17723
001.11.	001.11.	ork Permi	Ork Deimits US BV	7 7 6 7 7
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	001.09.	lcohol &	rug & Alcohol for Emps (initi	00579
001.09.	001.09.1	CPSAH	erformance Styrenics Anti-Harassment	00173
001.09.1	001.09.1	ti-Har	nti-Harassment Policy	07836
001.04.2	001.04.2	rocess Mg	rocess Safety Mgt Overview US_BV	15040
001.04.3	001.04.1	ᅜ	cess To Exposure/Medical Records	15030
001.04.1	001.04.1	CC	oill Prevention Control &	15041
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000.12.2	000.12.2	C	oxic Substance & Control Act US	15042
000.12.2	000.12.2	rk Per	ork Permits US BV	15041
000.12.2	000.12.2	espirator	Sprotection US BV	7 7 0 4 0
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000.12.2		rero. Sa	trogen Safety US_BV	15040
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		ine Break	ine Breaking US_BV	15040
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000.12.2	000.12.2	andPwrTo	and & Power Tool Saf	15035
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009.11	009.11	PCC	pill Prevention Control & Count	TEDATO
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009.09	009.09	SA Trn	esource Conservation	01504
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08.10.	08.10.	4 6 6	gonomics, Office (CBT) NOVA	1071
08.10.	08.10.	a ca	gonomics, Industrial	1036
08.10.	08.10.	BSHKLKIKN	S Hourly Training_BV	1771
08.09.		azard	azard Communication US	100
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08.07.	08.07.	gocore	Spestos Awareness_b*	1624
08.04.	08.04.	p.	ccess To Exposure/Medical Mecolus	1503
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0 0 1	07.11.	₽CC	esource Conservactor & Countern	1504
7.11.	7.11.	CRA	lectrical Safety 1 U	1503
7.10.	7.10.	0 (oxic Substance & Control Act US_B	1504
7.08.	7.08.	30 P	earing Protection _ BV	1503
7.08.	7.08.	10101	ortable Fire Extingui	1503
7.08.	7.08.	4 0	bestos Awareness_BV	1624
7.05.	7 05	EMR	ccess To Exposure/Medica	7 7 0 0 0
7.05.	л . оп .	MRe	atique Countermeasures CBT Refresher	1504
7 . 0	7.03.	espirato	ratiogen parery of the	1504
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6.10.2	6.10.2	CC	adder Safety US_BV	1503
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* Confidential as per information protection policy	tial as per inform	* Confiden
	10:58:46	Run Time: 10:58:46
Report to list education and courses taken by employees	Run Date: 2013.09.26	Run Date:
NOVA Chemicals	ZHRR0034	Program: ZHRR0034

4	Usei	a G
C34 10	MANZHET J	

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Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment # 10 of 13

Beaver Valley Site Integrated Contingency Plan



NOVA Chemicals 400 Frankfort Road Monaca, PA 15061-2298

October 17, 2012

Original

NOVA Chemicals		Beaver Valley Site Integrated Contingency Plan
TITLE: Table of Co	ontents	BV-ICP-TOC
	Plan Owner	Plan Approver
Approved By	Process Safety Engineer	Manufacturing Leader
Name	Drew Enochs	John Feraco
Next review date	10/	25/13

Section 1.0 Introduction

- Purpose, Scope, Requirements 1.1
 - 1.1.1 How to use the Manual
 - 1.1.2 Purpose
 - 1.1.3 Scope
 - 1.1.4 **Emergency Response Policy**
 - 1.1.5 Emergency Response Philosophy
 - 1.1.6 Requirements
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 - 1.1.4.2 Industrial activity
 - 1.1.4.3 Site layout and general chemical hazards
- 1.2 Facility identification information
 - 1.2.1 Responsibilities
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 - 1.2.2.1 Facility/Property Owner Profile
 - 1.2.2.2 Key Contacts

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- 2.1 Scope
- 2.2 References
- 2.3 **Definitions**

2.4 Core Plan Elements

- 2.4.1 Discovery
- 2.4.2 Initial Response
 - 2.4.2.1 Activating the emergency response system
 - 2.4.2.2 Initial actions for non-emergency responders
 - 2.4.2.3 Initial actions for emergency responders
 - Response
 - Response Management
 - o Developing Incident Action Plans
 - Internal Communications
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- 2.4.3 Sustained Action
 - Expanded Response Management
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 - 3.1.2 Historical Ownership
 - 3.1.3 Nearby Surface Waters
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 - 3.1.5 Facility Hazards
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 - Vulnerability Zones
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- 3.2 Notifications
 - 3.2.1 Internal Notification and Reporting
 - 3.2.1.1 Initial Notification and Documentation
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 - 3.2.1.5 General Alarm Call Out Directory
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Printed copies of this document (excluding signed master copies) are uncontrolled documents and may not be the latest version. To ensure you are using the current version, please check the BV Web Page/Responsible Care / ICP Manual

- 3.2.3 Federal and State Agency Notification
- 3.2.4 Urgent Injury or Death Notification Process
- 3.2.5 Critical Incident Stress Debriefing for Emergency Responders
- 3.2.6 Public Information Media
- 3.2.7 BASF Emergency Response Statement
- 3.2.8 AES Emergency Response Statement
- 3.3 Response Management System
 - 3.3.1 General
 - 3.3.1.1 Description of Response Management System
 - 3.3.1.2 Position Descriptions
 - 3.3.1.3 Information Flow
 - 3.3.1.4 Unified Command
 - 3.3.2 Command
 - 3.3.2.1 Incident Commander
 - 3.3.2.2 Internal and External Communications
 - 3.3.2.3 Emergency Assistance
 - 3.3.2.4 Safety
 - 3.3.2.5 Site Evacuation
 - 3.3.2.6 Liason
 - 3.3.3 Operations
 - 3.3.3.1 Incident Action Plans
 - 3.3.3.2 Discharge or Release Control
 - 3.3.3.3 Assessment/Monitoring
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 - 3.3.3.8 Salvage Plans
 - 3.3.3.9 Pre-Incidents for Specific Areas and Emergency Types
 - 3.3.3.10 Firefighting Operations
 - 3.3.4 Roles and Responsibilities for Occupational Health Professionals
 - 3.3.4.1 Area or Incidental Alarm
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- 3.3.5.2 Protection
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3.3.6 Logistics

- 3.3.6.1 Medical Needs of Responders
- 3.3.6.2 Site Security

Perimeter Control

Visitors and Contractors

Facility Security Plan

MARSEC

Preservation of Evidence

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- 3.3.6.5 Personnel Support
- 3.3.6.6 Equipment Maintenance

3.3.7 Finance / Procurement

- 3.3.7.1 Resource List
- 3.3.7.2 Personnel Management
- 3.3.7.3 Response Equipment
- 3.3.7.4 Support Equipment
- 3.3.7.5 Contracting
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3.4 Incident Documentation

- 3.4.1 Post Accident Investigation
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3.5 Training and Exercise / Drills

- 3.5.1 Release Response Training
 - 3.5.1.1 Emergency Response Team
 - 3.5.1.2 Training Levels for Emergency Response Members

3.5.2 Other Training Programs

- 3.5.2.1 New Employees
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- 3.71 Material Compatibility
 - 3.7.1.1 New Site Facilities/Processes
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- 3.7.3 Preventive Maintenance
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 - Major Workplace Fire Hazards and Controls
- 3.7.5 Security
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- 3.7.6 Miscellaneous Preventive Measures
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 - 3.7.6.2 Containment of Spills
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 - 3.7.6.4 Fire Protection & Prevention
 - 3.7.6.5 Barge, Tank Car, and Truck Operations
 - 3.7.6.6 Batch Operations
 - 3.7.6.7 Dry Material Transfer
- 3.7.7 Methods for Release Detection
- 3.7.8 Stormwater Best Management Practices (BMPs)
- 3.7.9 Control of Fuel Sources
- 3.8 Regulatory Compliance
 - 3.8.1 Matrix
 - 3.8.2 Plan Certifications and Approvals
 - 3.8.2.1 Plan Certifications and Signatory Requirements
 - 3.8.2.2 Agency Plan Approval Letters

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ICS 102 Incident Commander Checklist

ICS 103 Incident Action Plan

ICS 104 Information Gathering for Transfer of Command

ICS 105 Command Center Checklist

ICS 106 Command Structure

ICS 107 Notifications

ICS 108 Planning Section Chief Checklist

ICS 109 Operational Period

ICS 110 Operations Chief Checklist

ICS 111 Finance / Administration Section Chief Checklist

ICS 112 Logistics Section Chief Checklist

ICS 113 Accountability Officer Checklist

ICS 114 Public Information Officer Checklist

ICS 115 Safety Officer Checklist ICS 116 Liaison Officer Checklist

ICS 117 Human Resource Officer Checklist

ICS 119 NOVA Chemicals Media Log Sheet

ICS 120 Scribe Checklist

ICS 201 Incident Briefing Form

ICS 203 Organization Assignment List

ICS 205 Incident Radio Communications Plan

ICS 213 General Message Form

ICS 214 Unit Log

ICS 215 Critical Vendor Emergency Contact List

ICS 301 EMERGENCY ID VERIFICATION FORM

4.2 Figures

Figure 1001 Site Layout and General Chemical Hazards

Figure 1002 Basic Hazard Assessment

Figure 1003 Site location

Figure 1004 Plot Plan

Figure 1005 Water Balance Diagram

Figure 1006 Site Drainage Plan

Figure 1007 Unfiltered Water

Figure 1008 Filtered Water

Figure 1009 Wastewater diagram - Storm water

Figure 1010 Waste Water Treatment System

Figure 1012 Certification- Substantial Harm Criteria

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Figure 1014 Proper Preparation Certification of Plan

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Figure 1016 Approved LEPC Off Site Response Plan

Figure 1018 Manufacturing Leader Approval

Figure 1019 example transformer PM work order

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Table 2002 Regulatory Agency Contacts

Table 2004 Liquid Chemical Storage

Table 2005 Vulnerability Analysis

Table 2006 Emergency Call-Out Directory

Table 2007 Community Contacts

Table 2008 Downstream Notifications

Table 2009 Regulatory Release Reporting

Table 2010 Fire Alarm Directory

Table 2011 Headcount Post - Total Form

Table 2012 Regulatory Compliance Matrix

Table 2013 Emergency Planning Zone

Table 2015 Material Inventory and Container Schedule

Table 2016 PADEP Regulated Storage Tanks

Table 2017 Total Waste Profile - 2006

Table 2018 Transformer Oil

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- 4.4.1 Incident Commander Command Center Position Manual
- 4.4.2 Incident Commander Operations Section Chief Position Manual
- 4.4.3 Safety Officer Position Manual
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- 4.4.10 Finance / Administration Section Chief Position Manual

Section 5.0 ERT Operations Manual

5.1 Operating Procedures

5.2 Pre-Incident Plans

Extrusion Fire - first floor

Extrusion Fire - Mezzanine

Field Tank Fire

ARCEL Line 1-first floor fire

Contractor Building Fire

D3 Reactor Area Fire- first floor

D3 Reactor Area Fire - second floor

Spill Matrix - Reportable Quantities

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5.3 Unit Specific Process Safety Information

Extrusion Unit Specific Process Safety Information

D3 Unit Specific Process Safety Information

D4 Unit Specific Process Safety Information

D2 Unit Specific Process Safety Information

EPS Packaging & Warehouse Unit Specific Process Safety Information

Utilities Unit Specific Process Safety Information

Liquid Handling Unit Specific Process Safety Information

Pilot Plant Unit Specific Process Safety Information

Technology Unit Specific Process Safety Information

5.4 Plans for Specific Types of Emergencies

5.4.01 Business Interruption.doc

5.4.02 Civil Unrest.doc

5.4.03 Environmental Emergency.doc

5.4.04 Industrial Rescue.doc

5.4.05 Major Process Incident.doc

5.4.06 Minor Fire.doc

5.4.07 Multiple Casualty Incident.doc

5.4.08 Natural Disaster.doc

5.4.09 Radioactive Source.doc

5.4.10 Bomb Threat.doc

5.4.11 Pandemic Flu.doc

5.4.12 Spill-Release.doc

5.4.13 Toxic Vapor Release.doc

5.4.14 Workplace Violence.doc

5.4.15 Biological Threat.doc

5.4.16 Security Breach Discovery and Notification.doc

5.4.17 CSX Rail Transportation Emergency Response Program.pdf

5.4.18 Nuclear Power Plant Emergency Classification System.doc

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY FACILITY INSPECTION PROGRAM

Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment #______ of 13

Tom DuPlessis [DUPLEST@novachem.com]
Friday, October 18, 2013 3:53 PM
Kline, James
NOVA Chemicals - USEPA RCRA Inspection Follow Up (Email 1 of 3)
Sign - Sand Blast Grit-Dust, 130929.docx; ATT15039.bin

James – the following information is provided to follow up on the RCRA inspection you conducted on September 25-26, 2013. I need to send you multiple emails because the attached pictures would make the file size too large to send or receive if I tried to include them in one email.

NOVA Chemicals Inc. 400 Frankfort Road Monaca, PA 15061 EPA ID #: PAR 000 023 986

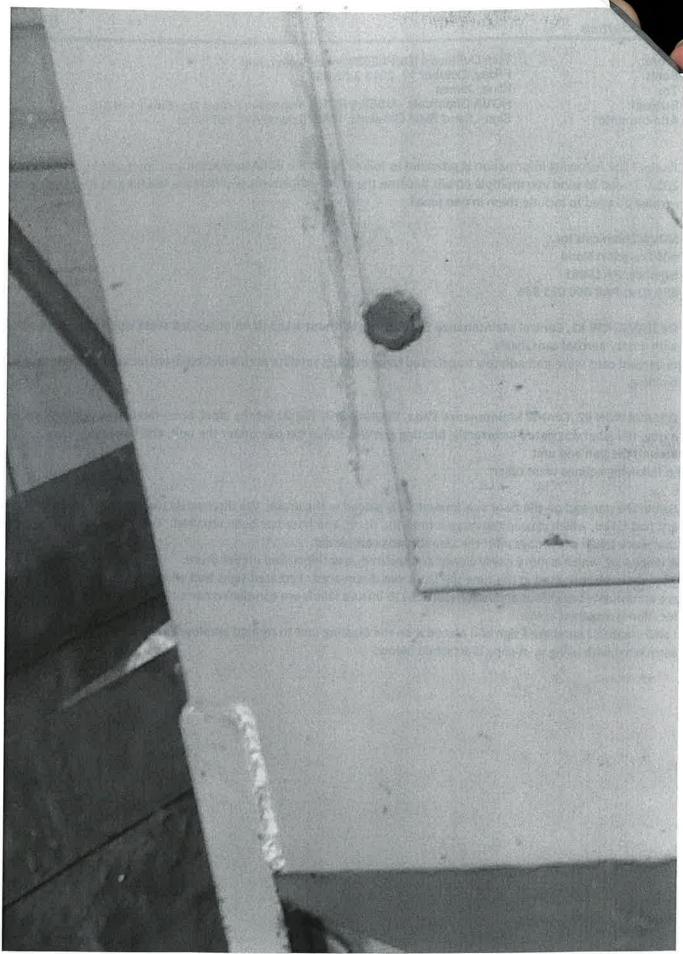
OBSERVATION #1, Central Maintenance Shop, Drum Without a Label: An unlabeled steel, open-head drum was found with empty aerosol cans inside.

e: The aerosol cans were immediately transferred to an existing satellite accumulation drum located elsewhere in the same building.

OBERVATION #2, Central Maintenance Shop, Blasting Grit: The lid for the steel, open-head drum was not secured with a ring, the label was dated incorrectly, blasting grit was still in the pan under the unit, and blasting grit was on the floor around the pan and unit.

e: The following actions were taken:

- a. Grit in the pan and on the floor was immediately placed in the drum. We discovered that the hose that circulates the grit had failed, which caused the release onto the floor. The hose has been repaired. Two pictures are attached below that were taken a few days after the cleanup was completed.
- b. A hinged lid, which is more easily closed and secured, was reinstalled on the drum.
- c. The label was corrected at the time the issue was discovered. I created signs that will be placed around the site where we accumulate hazardous and non-hazardous to ensure labels are completed correctly. A copy of the one for this location is attached below.
- d. I also created a laminated sign and placed it on the blasting unit to remind employees about the requirements associated with using it. A copy is attached below.





OBSERVATION #3, Central Maintenance Shop, Open Bucket with Unknown Contents: A bucket was found wand an unidentified material.

e: I dumped the contents of the bucket into a 5-gallon pail and found that it is soil and rocks. It has been sampled by a the party laboratory. I am awaiting results.

Additional emails to follow....

Please let me know if you have any questions.

Tom DuPlessis NOVA Chemicals Inc. Senior Environmental Engineer (724) 770-2350 (724) 770-2423 (fax)

SAND BLAST GRITDUST

- Make sure the hazardous waste drum is labeled.
- Empty the pan and sweep up any loose sand and put it in the drum when finished using the unit.
- Fully close the drum after adding sand.
- Date the label as soon as the drum is full.
- Move the full drum to the Haz Pad within three days.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY FACILITY INSPECTION PROGRAM

Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

Attachment #_12 of 13

subject: Attachments: Tom DuPlessis [DUPLEST@novachem.com]

Friday, October 18, 2013 3:53 PM

Kline, James

NOVA Chemicals - USEPA RCRA Inspection Follow Up (Email 2 of 3)

Waste Drum Labeling Instructions, 90D - QA, 0700523 (130929).pdf; Waste Drum Labeling Instructions, 90D - QA, 0999138 (130929).pdf; Waste Drum Labeling Instructions, SAA - QA, 0700523 (130929).pdf; EPM-3.2 - Drummed Waste Management (F2, rev 1, Weekly

Inspection Checklist).doc; Sign - Universal Waste Lamps, 130929.docx

James – this is the second of three emails:

OBSERVATION #4, QA Lab, Mislabeled Drum: One of three containers in the 90-day accumulation area for the QA Lab was mislabeled.

e: The date was immediately added to the label. In addition, laminated signs have been posted on the wall near the drum to provide employees examples of properly completed labels. Copies of the signs for the two profiles routinely stored at this location are attached below.

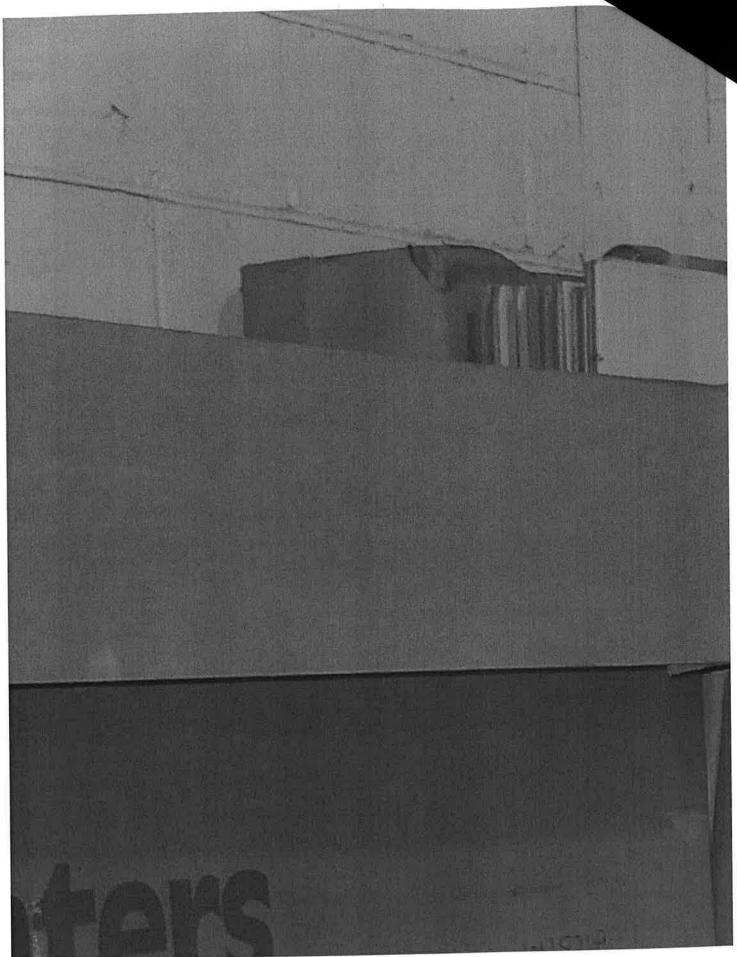


Lab, Open Container in Hood: An open hazardous waste satellite accumulation container was three hoods in which hazardous waste is accumulated.

instructions for completing the appropriate hazardous waste label have been posted in each hood. A copy of sign is attached below. In addition, I am working with both our QA and Technology labs to simplify the waste management process and to find the most appropriate containers for accumulating the waste in the hood. I've gotten feedback internally, from our third-party lab, and our hazardous waste vendor and on-line research. We are meeting next week to look at a sample container I recently received and to determine our path forward.

OBSERVATION #6, Universal Waste, Open Fluorescent Tube Box: A partially filled box of fluorescent tubes was found with the end not closed. The box contained a number of green-tipped 4-ft tubes and two u-shaped tubes.

e: The box was immediately taped shut. A copy of a picture showing the box closed is attached below. I met with the electricians to review the inspection findings and to communicate the requirement to keep all containers closed. The problem was largely caused by inadequate procedures. They emphasized taping full boxes, not all boxes. I corrected that in the meeting with electricians and also revised a checklist used to ensure we complete all of our weekly waste inspections. A copy of the revised form is attached below.



the wall, we have a shelf that we can use to place an empty box. The box will be kept close'd at all times are being added. Once the box is full, it will be placed on a pallet located below the shelf. Next to the being added. Once the box is a pallet with two, plastic, open-top, 55-gallon drums. One drum will be used for the boxes for fluorescent lamps is a pallet with two, plastic, open-top, 55-gallon drums. One drum will be used for the boxes for fluorescent lamps. A sign that summarizes the requirements the requirements are accumulated. A copy of this sign is attached below.

One more email to follow.

Let me know if you have any questions.

Tom DuPlessis NOVA Chemicals Inc. Senior Environmental Engineer (724) 770-2350 (724) 770-2423 (fax)

WASTE CONTAINER LABELING INSTRUCTIONS

90-Day Hazardous Waste Accumulation Area

Profile Number: 0700523

Waste Name: QA – Lab Solvents (Normal Waste)

Example Label

HAZARDO WASTI			DRUM NO.	BVR	012345
WASTE NAME:	Lab Solve	nts (Normal V	Vaste)		
DESCRIPTION:					\sim
SOURCE:	PROCESS:	QA Lab		he date oi	
	ACTIVITY:			s soon as s placed h	
PROFILE:	0700523		٧.		
ACCUMULATON S	START DATE:	xx/xx/xxxx	6		
FOR FURTHER IN	FORMATION CAL	L: Heather V	Veber, x550	6	

ATTACH THIS LABEL TO WASTE DRUM

- 1. Do not place empty drums here until they are ready to be used.
- 2. Write the date on label as soon as the drum is placed at this location.
- 3. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 4. Move the drum to the Haz Pad within three days.

WASTE CONTAINER LABELING INSTRUCTIONS

90-Day Hazardous Waste Accumulation Area

Profile Number: 0999138

Waste Name: Multi – Styrene Monomer with Inhibitor

Example Label

HAZARDO WASTI			DRUM NO.	BVR	012345	
WASTE NAME:	Styrene M	Ionomer with 1	nhibitor		ő	
DESCRIPTION:	_				~	
SOURCE:	PROCESS:	QA Lab		he date o		
	ACTIVITY:	// // // // // // // // // // // // //		s soon as s placed l		D)
PROFILE:	0999138			A		
ACCUMULATON	START DATE:	xx/xx/xxxx	6	<i>,</i> —		
FOR FURTHER IN	FORMATION CA	LL: Heather V	Veber, x55	06		

ATTACH THIS LABEL TO WASTE DRUM

- 1. Do not place empty drums here until they are ready to be used.
- 2. Write the date on label as soon as the drum is placed at this location.
- 3. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 4. Move the drum to the Haz Pad within three days.

WASTE CONTAINER LABELING **INSTRUCTIONS**

Hazardous Waste Satellite Accumulation

Profile Number: 0700523

Waste Name: QA – Lab Solvents (Normal Waste)

Example Label

HAZARDO WAST		DRUM _{BVR} 012345 NO.
WASTE NAME:	Lab Solve	ents (Normal Waste)
DESCRIPTION:		
SOURCE:	PROCESS:	QA Lab Do NOT write the date on the label
	ACTIVITY:	UNTIL the container
PROFILE:	0700523	is full.
ACCUMULATON	START DATE:	
FOR FURTHER IN	IFORMATION CAL	Heather Weber, x5506

ATTACH THIS LABEL TO WASTE DRUM

- 1. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 2. Write the date on the label as soon as the drum is full.
- 3. Move the drum to the Haz Pad within three days.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY FACILITY INSPECTION PROGRAM

Wheeling Operations Office 1060 Chapline Street Wheeling, West Virginia 26003-2995 (304) 234-0263

Nova Chemicals Inc. 400 Frankfort Road Monaca, Pennsylvania 15061-2298

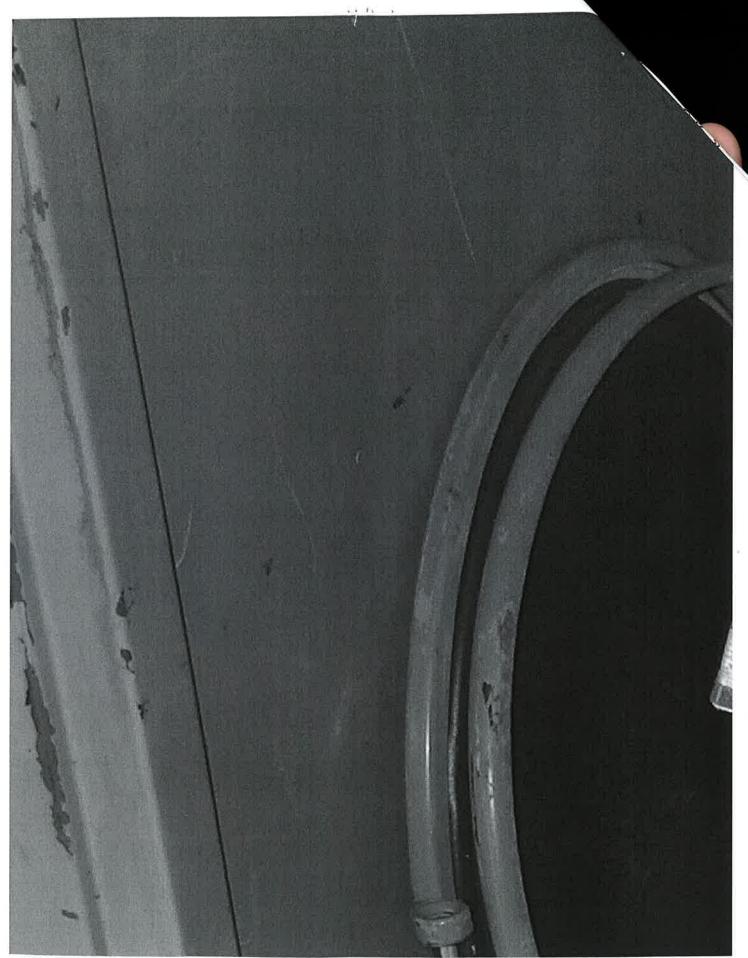
Attachment #_13 of 13

Tom DuPlessis [DUPLEST@novachem.com]
Friday, October 18, 2013 3:53 PM
Kline, James
NOVA Chemicals - USEPA RCRA Inspection Follow Up (Email 3 of 3)
Waste Drum Labeling Instructions, 90D - TECH, 1361848 (130929).pdf

nes - this is the third of three emails.

OBSERVATION #7, Technology, Mislabeled Drum: The label on a 10-gallon steel drum stored in a Hazardous Waste Temporary Storage Area (90-day) was not dated.

e: The date has been written on the drum label. Refer to the picture below. This container sat in the 90-day area for some time empty and with an undated label. When waste was finally added to the container on 8/30, we did not update the label with the date. As you will note on the attached sign, to avoid a recurrence, we instruct employees to not place empty containers in the 90-day area until they are ready to be used.



wif you have any questions or if you need any additional information.

Chemicals Inc. or Environmental Engineer (724) 770-2423 (fax)

WASTE CONTAINER LABELING **INSTRUCTIONS**

90-Day Hazardous Waste Accumulation Area

Profile Number: 1361848

Waste Name:

TECH – Waste Flammable Liquids

Example Label

HAZARDOUS WASTE

DRUM

BVR

012345

NO.

WASTE NAME:

Waste Flammable Liquids

DESCRIPTION:

SOURCE:

Technology

Write the date on the label as soon as the drum is placed here.

PROFILE:

1361848

PROCESS:

ACTIVITY:

ACCUMULATON START DATE: XX/XX/XXXX

FOR FURTHER INFORMATION CALL: Rudy Fukas, x4322

ATTACH THIS LABEL TO WASTE DRUM

- 1. Do not place empty drums here until they are ready to be used.
- 2. Write the date on label as soon as the drum is placed at this location.
- 3. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 4. Move the drum to the Haz Pad within three days.

Jimenez, Jose

From:

Kline, James

Sent:

Thursday, April 17, 2014 4:47 PM

To:

Jimenez, Jose

Subject: Attachments:

FW: NOVA Chemicals - USEPA RCRA Inspection Follow Up (Email 3 of 3) Waste Drum Labeling Instructions, 90D - TECH, 1361848 (130929).pdf

From: Tom DuPlessis [mailto:DUPLEST@novachem.com]

Sent: Friday, October 18, 2013 3:53 PM

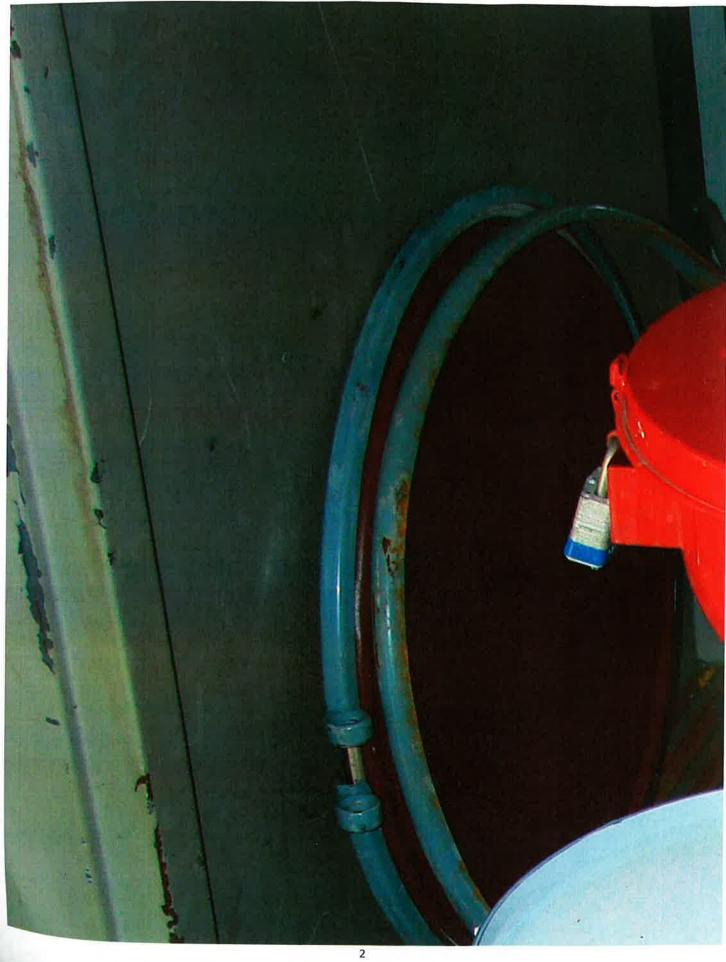
To: Kline, James

Subject: NOVA Chemicals - USEPA RCRA Inspection Follow Up (Email 3 of 3)

James – this is the third of three emails.

OBSERVATION #7, Technology, Mislabeled Drum: The label on a 10-gallon steel drum stored in a Hazardous Waste Temporary Storage Area (90-day) was not dated.

The date has been written on the drum label. Refer to the picture below. This container sat in the 90-day area for some time empty and with an undated label. When waste was finally added to the container on 8/30, we did not update the label with the date. As you will note on the attached sign, to avoid a recurrence, we instruct employees to not place empty containers in the 90-day area until they are ready to be used.



Please let me know if you have any questions or if you need any additional information.

Tom DuPlessis NOVA Chemicals Inc. Senior Environmental Engineer (724) 770-2350 (724) 770-2423 (fax)





Weekly Inspection Checklist

P1	repared By: Date:
	DATA QA CHECKLIST
H	AZ PAD INSPECTION: All drums on inventory sheet are accounted for.
	New drums added to the pads have been recorded in the database.
	All drums are properly labeled and aligned accordingly.
	All unusual observations have been reported on the inspection sheets.
	Labels have been moved to the appropriate section in the Black Box.
	Ay Down Area Inspection: Any new material added to the Lay Down Area has been noted on the inspection form. The capacity of the roll-offs has been recorded. If full, the contact person for the particular roll-off has been contacted. If C & D Debris roll-off is full, WM has been called to pick it up.
	Lamp storage area in stores has been inspected. Labels have been placed on all boxes. All boxes, drums, and containers are securely closed. Area is clean and orderly. Spent battery area next to Central Maintenance has been inspected. Batteries are segregated and labels are in place for all battery types.
	☐ Terminals are taped, or otherwise secured.
	Inspections Sheets: • Haz Pad • Laydown Area Updated Inventory Sheets (compiled by the database):
	 Haz Pad Inventory In-Plant

SAND BLAST GRIT/DUST

- Make sure the hazardous waste drum is labeled.
- Empty the pan and sweep up any loose sand and put it in the drum when finished using the unit.
- Fully close the drum after adding sand.
- Date the label as soon as the drum is full.
- Move the full drum to the Haz Pad within three days.

WASTE CONTAINER LABELING INSTRUCTIONS

Hazardous Waste Satellite Accumulation

Profile Number: 0700523

Waste Name: QA – Lab Solvents (Normal Waste)

Example Label

HAZARDO WASTI		DRUM NO.	BVR	012345	
WASTE NAME:	Lab Solvents (Norm	al Waste)			
DESCRIPTION:					
SOURCE:	PROCESS: QA La		o <u>NOT</u> wri ate on the		
	ACTIVITY:	UN	TIL the co is full.		
PROFILE:	0700523				
ACCUMULATON :	START DATE:	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			
FOR FURTHER IN	FORMATION CALL: Heat	ner Weber, x550)6		
	ATTACH THIS L	ABEL TO WASTE	DRUM		

- 1. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 2. Write the date on the label as soon as the drum is full.
- 3. Move the drum to the Haz Pad within three days.

WASTE CONTAINER LABELING INSTRUCTIONS

90-Day Hazardous Waste Accumulation Area

Profile Number: 0999138

Waste Name: Multi - Styrene Monomer with Inhibitor

Example Label

HAZARDO WASTI		DRUM NO.	BVR	012345	
WASTE NAME:	Styrene Monomer	with Inhibitor			
DESCRIPTION:			\	~	
SOURCE:	PROCESS: QA L		te the date o		
	ACTIVITY:		el as soon as m is placed		
PROFILE:	0999138	~	M		
ACCUMULÀTON	START DATE:XX/XX/X	XXX			
FOR FURTHER II	NFORMATION CALL: Hear	ther Weber, x	5506		P
	ATTACH THIS L	ABEL TO WAS	TE DRUM		

- 1. Do not place empty drums here until they are ready to be used.
- 2. Write the date on label as soon as the drum is placed at this location.
- 3. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 4. Move the drum to the Haz Pad within three days.

WASTE CONTAINER LABELING INSTRUCTIONS

90-Day Hazardous Waste Accumulation Area

Profile Number: 0700523

Waste Name: QA – Lab Solvents (Normal Waste)

Example Label

HAZARDO WASTE			DRUM NO.	BVR	012345
WASTE NAME:	Lab Solvents (Normal W	aste)		
DESCRIPTION:					~
SOURCE:	PROCESS: Q	A Lab		he date on	
	ACTIVITY:			s soon as s placed h	
PROFILE:	0700523			A	
ACCUMULATON S	START DATE:XX/	xx/xxxx	6	, _	
FOR FURTHER IN	FORMATION CALL:	Heather V	Veber, x550)6	
	ATTACH TI	HIS I AREI	TO WASTE	DDIIM	

- 1. Do not place empty drums here until they are ready to be used.
- 2. Write the date on label as soon as the drum is placed at this location.
- 3. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 4. Move the drum to the Haz Pad within three days.

WASTE CONTAINER LABELING INSTRUCTIONS

90-Day Hazardous Waste Accumulation Area

Profile Number: 1361848

Waste Name: TECH – Waste Flammable Liquids

Example Label

HAZARDO WASTE	-		UM O.	BVR	0123	345	
WASTE NAME:	Waste Fla	mmable Liquids					
DESCRIPTION;					~	1	_
SOURCE:	PROCESS:	Technology		the date)	
	ACTIVITY:			as soon a is pla ced		2	—
PROFILE:	1361848	~		1	1		
ACCUMULATON S	START DATE:	XX/XX/XXXX	8	<i>_</i>			
FOR FURTHER IN	FORMATION CAL	L: Rudy Fukas, x4	322				

ATTACH THIS LABEL TO WASTE DRUM

- 1. Do not place empty drums here until they are ready to be used.
- 2. Write the date on label as soon as the drum is placed at this location.
- 3. Forward the drum label receipt to Responsible Care so the drum can be tracked.
- 4. Move the drum to the Haz Pad within three days.